ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

In the Matter of	)	
	)	
Amendment of Sections 73.202(b),	)	MB Docket No. 00-___
Table of Allotments,	)	RM-_____
FM Broadcast Stations,	)	
(Grass Valley and	)	
Citrus Heights, California)	)	

To: Office of the Secretary
Attention: Chief, Audio Division
Media Bureau

ERRATA

Educational Media Foundation ("EMF"), licensee of KLVS(FM) on Channel 257B1 in Grass Valley, California, by its attorneys, hereby submits this errata to correct minor errors contained in the Engineering Statement submitted with its Petition for Reconsideration ("Petition") of the Commission's decision to return its Petition for Rulemaking in the above-referenced proceeding. The Petition was timely filed on October 12, 2004. The Petition included, at Exhibit A, an Engineering Statement and Map prepared by Sam Wallington, EMF's Director of Engineering, to demonstrate that EMF's proposed reallotment of Channel 258A from Grass Valley to Citrus Heights, California fully complies with Section 73.315(a) of the Commission's Rules and is in the public interest.

The purpose of this errata is to simply submit an updated Engineering Statement to correct minor errors in the previous statement. The substance of this Engineering Statement has not changed. A complete, corrected copy of the Engineering Statement is attached as Exhibit A.

Respectfully submitted,

EDUCATIONAL MEDIA FOUNDATION

By: _____

David D. Oxenford
Amy L. Van de Kerckhove

Its Attorneys

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Dated: October 19, 2004

EXHIBIT A

Educational Media Foundation
5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Exhibit A

DECLARATION
ENGINEERING STATEMENT

Educational Media Foundation ("EMF"), licensee of FM Station KLVS(FM) Channel 257B1 Grass Valley, California has prepared this Engineering Statement in support of a Petition for Rule Making to amend the Table of FM Allotments, Section 73.202(b), to allocate Channel 258A to Citrus Heights, California, as its first local aural transmission service. It is proposed to amend the Table of FM Allotments as follows:

Community	Present Allocation	Proposed Allocation
Grass Valley, CA	231A, 257B1, 277A	231A, 277A
Citrus Heights, CA	--	258A

As the proposed change is mutually exclusive with its current license, EMF proposes to change the city of license for KLVS(FM) from Grass Valley, California to Citrus Heights, California and downgrade from Class B1 to Class A in accordance with Section 1.420(i) of the Commission's rules. The reference coordinates of Citrus Heights are as follows:

NAD-27
North Latitude: 38-41-30
West Longitude: 121-17-12

EMF has located a transmitter site that meets the spacing requirements and the selected site is identified as follows:

NAD-27
North Latitude: 38-38-37
West Longitude: 121-05-27

The site is currently used by EMF translator K256AG, Clarksville, California. Since there is both reasonable assurance of site availability and FAA clearance (FAA Study No. 92-AWP-0980-OE) at this site, EMF proposes to utilize the same tower for KLVS, should this proposal be granted.

Citrus Heights

According to the United States Census Bureau, the 2000 population figure for Citrus Heights, California is 85,071 people. The city (which was incorporated in 1997) lies in Sacramento County, with a county population of 1,223,499. Allocating Channel 258A to Citrus Heights will provide coverage within the 70dBu contour to 517,378 persons, and within the 60dBu contour to 1,396,888 people (an area of 3,097.2 sq. km).

Within its 60dBu contour, the present KLVS Class B1 facility covers a population of 183,058 people within an area of 5,349.8 sq. km. Compared to the proposed facility at

Citrus Heights, the proposed change will provide a 664.4% increase in population and an overall decrease in area of 42.1%.

Moving KLVS(FM) to Citrus Heights, California, and changing from Class B1 to Class A would not only provide service to a larger population, but would make a more efficient use of the FM spectrum.

Exhibit A-1 is an FM channel study for Channel 258A from the reference coordinates for the proposed city of license, Citrus Heights, California, showing a 15.37 kilometer short spacing. Therefore EMF is requesting this allotment be granted with the requirement that the station be located a minimum of 15.37 kilometers east of Citrus Heights.

Exhibit A-2 is an FM channel study for Channel 258A from the specified antenna site east of Citrus Heights. As shown, Channel 258A from this site meets the requirements of Section 73.207 of the Rules and Regulations.

Exhibit A-3 and A-4 show the predicted distance to the 70 dBu contours for the proposed Citrus Heights and the current KLVS at Grass Valley with associated population and coverage area figures.

Exhibit A-5 is a map showing the 70dBu and 60dBu contours of the proposed KLVS operation on Channel 258A and the city of license, Citrus Heights, California. The proposed 70dBu contour covers all of Citrus Heights thereby meeting the requirements of Section 73.315 of the Rules and Regulations. The city limits of Citrus Heights are indicated on this map.

Exhibit A-5 is a map showing the 70dBu and 60dBu contours of the proposed KLVS operation on Channel 258A and the city of license, Citrus Heights, California. The proposed 70dBu contour covers all of Citrus Heights, and the proposed 60 dBu covers the urban population. Exhibit A-6 is a showing of the elevation profile from the proposed transmitter to Citrus Heights. The site chosen maximizes coverage with no interference, is high in elevation, has line of sight to Citrus Heights, and has no obstructions toward the city of license. Therefore, this petition fully meets the requirements of Section 73.315 of the Rules and Regulations.

CONCLUSION

The petitioner affirms its intention to file an application to modify KLVS for operation on Channel 258A at Citrus Heights, if it is allotted, and, if authorized, to build the requested facility promptly.

It is believed that all methods employed in making the determinations contained within this Engineering Statement were in accordance with applicable FCC Rules and Regulations and good engineering practice.

Educational Media Foundation

Exhibit A

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For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals starting at True North were extracted from the computerized thirty-second point elevation database version of **Elevation Data for North America**, available at the Department of Commerce, National Geophysical Data Center, National Oceanic and Atmospheric Administration. A total of 131 points along each radial were linearly interpolated according to section 73.312(d). For HAAT calculations in Exhibits A-3 and A-4, eight radials were utilized.

The height above average terrain along each of the eight radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with section 73.313(d)(3).

The locations of the 60 and 70 dBu F(50,50) service contours were calculated according to the computer methods outlined in F.C.C. publication PB-249144, **Field Strength Calculations for TV and FM Broadcasting**. The computer methods use digitized data taken directly from the graph of section 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Sam Wallington
Director of Engineering
Educational Media Foundation
October 19, 2004

Educational Media Foundation

Exhibit A-1

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Channel 258A at Citrus Heights Reference Coordinates

REFERENCE
38 41 30 N
121 17 12 W

CLASS = A
Current Spacings
Channel 258 - 99.5 MHz

DISPLAY DATES
DATA 09-25-04
SEARCH 10-11-04

Call	Channel	Location		Dist	Azi	FCC	Margin
KLVS.C	CP -N 257B1	Grass Valley	CA	67.52	24.2	96.0	-28.48
KLVS	LIC 257B1	Grass Valley	CA	73.11	27.3	96.0	-22.89
KNTI	LIC 258B	Lakeport	CA	162.63	288.1	178.0	-15.37
KRCXFM	LIC 260B	Marysville	CA	73.40	321.3	69.0	4.40
KJOY.C	CP -Z 257A	Stockton	CA	77.70	180.1	72.0	5.70
KJOY	LIC-Z 257A	Stockton	CA	77.70	180.1	72.0	5.70
KVYN	LIC-Z 257A	St. Helena	CA	95.25	252.2	72.0	23.25
KXJZ	LIC-D 205B	Sacramento	CA	50.09	202.1	15.0	35.09
KFRCFM	LIC 259B	San Francisco	CA	150.11	222.3	113.0	37.11
KQOD	LIC 261A	Stockton	CA	77.86	175.3	31.0	46.86
KARA	LIC-N 256A	Williams	CA	88.37	304.2	31.0	57.37
KXJS.C	CP -D 204B1	Sutter	CA	73.40	321.3	12.0	61.40
KLOKFM	LIC 258B	Greenfield	CA	247.22	180.2	178.0	69.22
KTHXFM	LIC-Z 261C1	Dayton	NV	150.79	64.7	75.0	75.79
KSOL	LIC 255B	San Francisco	CA	145.63	224.7	69.0	76.63
KCVRFM	LIC 255A	Columbia	CA	108.25	132.0	31.0	77.25
KBNF	LIC 255C	Chester	CA	172.69	7.5	95.0	77.69
KCMY.C	CP -N 256C3	Gardnerville-minden	NV	128.82	76.1	42.0	86.82
KZST	LIC 261A	Santa Rosa	CA	124.82	256.3	31.0	93.82
KCMY	LIC-D 256A	Gardnerville-minden	NV	128.82	76.1	31.0	97.82
KCIV	LIC 260B	Mount Bullion	CA	169.64	139.0	69.0	100.64
KTOR	LIC 259A	Westwood	CA	173.20	7.2	72.0	101.20
AL259	RSV 259A	Westwood	CA	173.20	7.2	72.0	101.20
KSQL	LIC-D 256B	Santa Cruz	CA	182.16	195.7	69.0	113.16
KUNR	LIC 204C	Reno	NV	150.90	64.7	29.0	121.90
KNNN	LIC-N 257C2	Shasta Lake City	CA	242.22	334.6	106.0	136.22
KMPO	LIC 204B	Modesto	CA	169.64	139.0	15.0	154.64

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Exhibit A-2

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Channel 258A at Proposed Antenna Site

REFERENCE
38 38 37 N
121 05 27 W

CLASS = A
Current Spacings
Channel 258 - 99.5 MHz

DISPLAY DATES
DATA 10-12-04
SEARCH 10-18-04

Call	Channel	Location		Dist	Azi	FCC	Margin
KLVS.C	CP -N 257B1	Grass Valley	CA	67.73	9.2	96.0	-28.27
KLVS	LIC 257B1	Grass Valley	CA	72.16	13.4	96.0	-23.84
KJOY	LIC-Z 257A	Stockton	CA	74.39	193.4	72.0	2.39
KJOY.C	CP -Z 257A	Stockton	CA	74.39	193.4	72.0	2.39
KNTI	LIC 258B	Lakeport	CA	180.49	288.1	178.0	2.49
KRCXFM	LIC 260B	Marysville	CA	88.79	315.0	69.0	19.79
KVYN	LIC-Z 257A	St. Helena	CA	110.35	257.7	72.0	38.35
KXJZ	LIC-D 205B	Sacramento	CA	54.60	221.2	15.0	39.60
KQOD	LIC 261A	Stockton	CA	73.07	188.5	31.0	42.07
KFRCFM	LIC 259B	San Francisco	CA	158.51	228.3	113.0	45.51
KCVRFM	LIC 255A	Columbia	CA	92.30	136.7	31.0	61.30
KTHXFM	LIC-Z 261C1	Dayton	NV	138.16	59.8	75.0	63.16
KLOKFM	LIC 258B	Greenfield	CA	242.57	184.4	178.0	64.57
KCMY.C	CP -N 256C3	Gardnerville-minden	NV	113.91	71.6	42.0	71.91
KARA	LIC-N 256A	Williams	CA	105.60	301.6	31.0	74.60
KXJS	LIC-D 204B1	Sutter	CA	88.79	315.0	12.0	76.79
KBNF	LIC 255C	Chester	CA	176.59	2.0	95.0	81.59
KCMY	LIC-D 256A	Gardnerville-minden	NV	113.91	71.6	31.0	82.91
KCIV	LIC 260B	Mount Bullion	CA	154.70	142.6	69.0	85.70
KSOL	LIC 255B	San Francisco	CA	154.70	230.7	69.0	85.70
AL259	RSV 259A	Westwood	CA	177.21	1.6	72.0	105.21
KTOR	LIC 259A	Westwood	CA	177.21	1.6	72.0	105.21
KUNR	LIC 204C	Reno	NV	138.26	59.8	29.0	109.26
KZST	LIC 261A	Santa Rosa	CA	140.44	260.2	31.0	109.44
KSQL	LIC-D 256B	Santa Cruz	CA	182.56	201.4	69.0	113.56
KMPO	LIC 204B	Modesto	CA	154.70	142.6	15.0	139.70
KJWL	LIC-N 257B1	Fresno	CA	241.05	151.2	96.0	145.05
KVLVFM	LIC 257A	Fallon	NV	218.61	63.5	72.0	146.61
KNNN	LIC-N 257C2	Shasta Lake City	CA	254.70	331.8	106.0	148.70

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Exhibit A-3

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Distance to the 70 dBu F(50,50) contour for Proposed Ch 258A at Citrus Heights

Call Letters: KLVS.P
File Number: BLED20021003ABA
Latitude: 38-38-37 N
Longitude: 121-05-27 W
ERP: 6.00 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 285.93 m
Elevation: 211.8 m
Horiz. Antenna Pattern: Omni

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 50.0 %
# of Radials Calculated: 8
Field Strength: 70.00 dBuV/m

Bearing (deg)	Distance (km)	HAAT (m)
0.0	14.6	83.9
45.0	8.9	-88.9
90.0	8.9	-60.6
135.0	13.1	66.7
180.0	22.4	191.4
225.0	23.3	208.2
270.0	23.9	219.6
*287.44**	*23.7*	*215.6*
315.0	21.8	179.7

Average HAAT for radials shown: 100.0 m

*Extra radial included to show HAAT toward proposed city of license. This radial is not calculated in average HAAT.

Area and population calculated with 360 radials:
60 dBu F(50,50) Area = 3097.23
70 dBu F(50,50) Population using 2000 Census Block data: 517,378
60 dBu F(50,50) Population using 2000 Census Block data: 1,396,888

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Exhibit A-4

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Distance to the 70 dBu F(50,50) contour for Current KLVS Ch 257B1 (Licensed facility) at Grass Valley

Call Letters: KLVS
File Number: BLED20021003ABA
Latitude: 39-16-33 N
Longitude: 120-53-49 W
ERP: 13.00 kW
Channel: 257
Frequency: 99.3 MHz
AMSL Height: 1160.0 m
Elevation: 1138.0 m
Horiz. Antenna Pattern: Omni
Vert. Elevation Pattern: No

Type of contour: FCC
Location Variability: 50.0 %
Time Variability: 50.0 %
# of Radials Calculated: 360
Field Strength: 70.00 dBuV/m

Bearing (deg)	Distance (km)	HAAT (m)
0.0	16.0	66.8
45.0	12.9	43.6
90.0	10.8	-103.7
135.0	22.4	129.0
180.0	35.7	347.0
225.0	32.3	283.7
270.0	32.4	285.5
315.0	32.6	287.6

Average HAAT for radials shown: 167.29 m

Area and population calculated with 360 radials:
60 dBu F(50,50)Area =5349.78
70 dBu F(50,50)Population using 2000 Census Block data: 102,011
60 dBu F(50,50)Population using 2000 Census Block data: 183,058

BROADCASTING

Exhibit A-5

KLVS.P
BLED20021003ABA
Latitude: 38-38-37 N
Longitude: 121-05-27 W
ERP: 6.00 kW
Channel: 258
Frequency: 99.5 MHz
AMSL Height: 285.93 m
Elevation: 240.7 m
HAAT: 100.0 m
Antenna Pattern: Omni

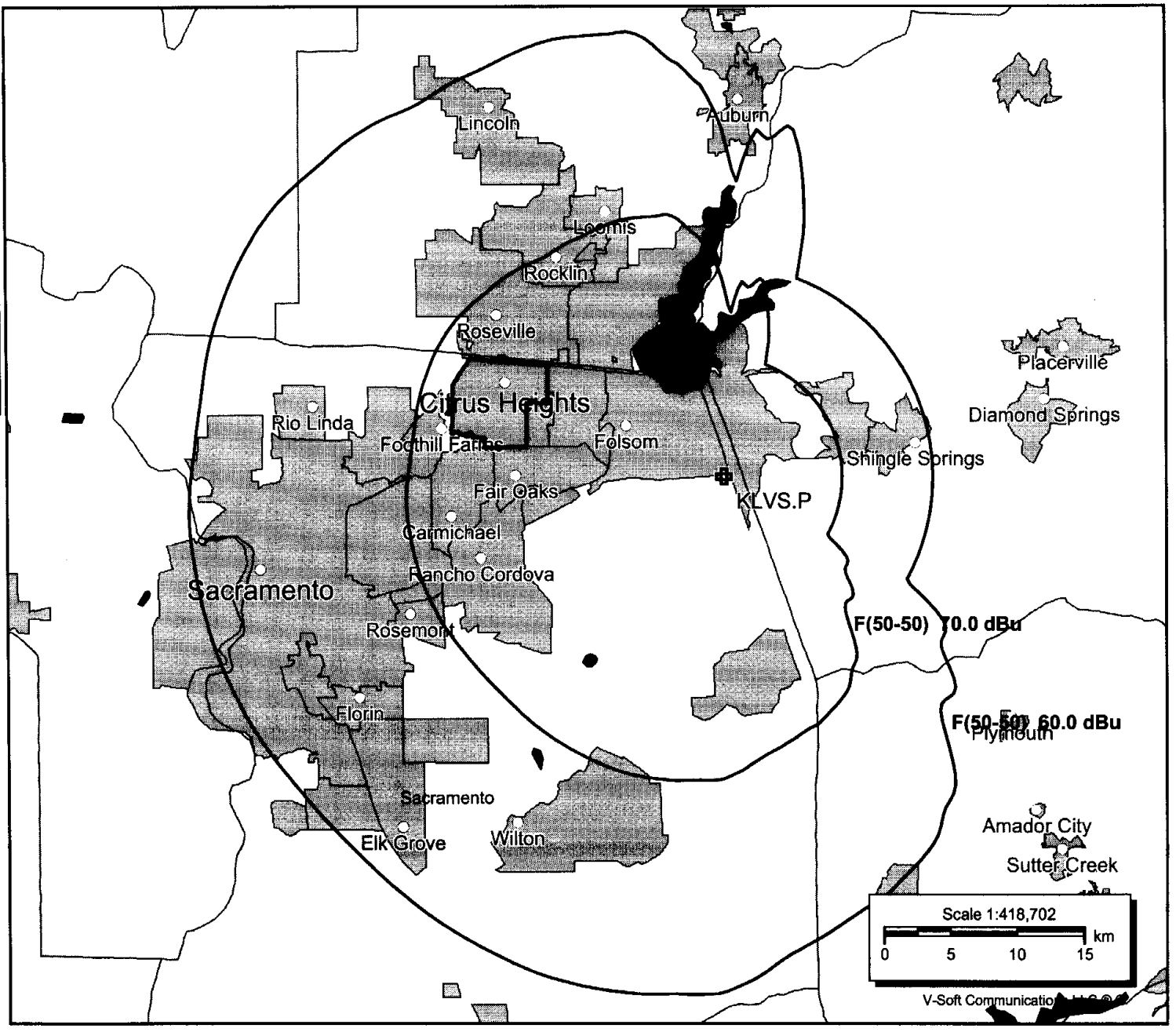

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Exhibit A-6

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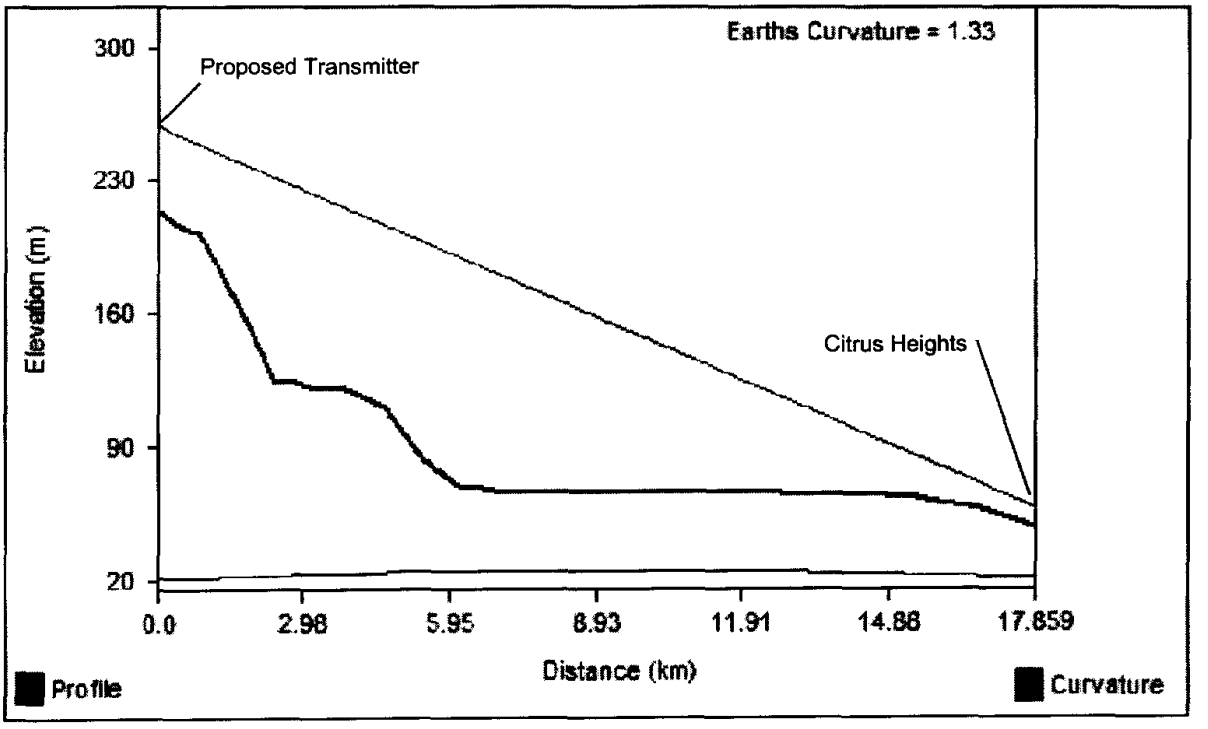
Line of Sight From Proposed Site to Citrus Heights



CERTIFICATE OF SERVICE

I, Rhea Lytle, hereby certify that I have on this 19th day of October 2004 caused a copy of the foregoing "**ERRATA**" to be served by first class U.S. mail, postage prepaid, upon the following:

Mr. John A. Karousos, Assistant Chief
Audio Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C485
Washington, DC 20554

Mr. Barthen Gorman
Audio Division
Media Bureau
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Rhea Lytle

* Via Hand Delivery